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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DARE INVESTMENTS, LLC, a Utah limited liability company,

Plaintiff,

vs.

CHICAGO TITLE INSURANCE COMPANY, a Missouri domiciled insurer;
HORIZON TITLE AGENCY, Inc., a New Jersey domiciled company;
CHICAGO TITLE RICO ENTERPRISE, a racketeering enterprise,

Defendants.

CIVIL ACTION NO. 10-6088

Civil Action

CERTIFICATION OF CHIRSTOPHER C. HUMPHREY, ESQ. IN SUPPORT OF PLAINTIFF'S APPLICATION FOR ENTRY OF DEFAULT JUDGMENT AGAINST HORIZON TITLE AGENCY AND CHICAGO TITLE RICO ENTERPRISE

Christopher C. Humphrey of full age, certifies as follows:

1. I am the Principal of HUMPHREY LAW LLC, local counsel for Plaintiff Dare Investments, LLC. I have personal knowledge of the matters set forth herein and submit this Certification in support of Plaintiff's Application for Entry of Default Judgment against Horizon Title Agency ("Horizon Title") and Chicago Title RICO Enterprise.
2. Plaintiff filed an Application for the Entry of Default against the above named defendants and supporting Certification of Counsel on this date.
3. Plaintiff hereby requests the entry of default judgment for a sum certain jointly and severally against Horizon Title Agency and Chicago Title RICO Enterprise.

4. Defendant Horizon Title and Chicago Title RICO Enterprise are not individuals that have served, or are able to serve, in the United States Military. Nor are the Defendants infants or incompetent persons.

5. Plaintiff alleges in its Complaint, *inter alia*, that the Horizon Title and Chicago Title Rico Enterprise (the “Defendants”) engaged in a pattern of racketeering activity, and conspired to commit acts of racketeering activity, as indicated in Plaintiff’s Complaint and evidenced by the documents attached as exhibits thereto upon which the Plaintiff relies in support of its application for the entry of default judgment.

6. Chicago Title RICO Enterprise was a racketeering enterprise and Horizon Title and its principals participated in that enterprise.

7. The Defendants issued title insurance policies as a part of their enterprise.

8. The Defendants participated in at least two (2) predicate acts of racketeering and their conduct constitutes a pattern of racketeering activity.

9. Plaintiff has been damaged by Defendants’ racketeering in the amount of \$15,000,000.00 and is entitled to treble damages, consequential damages, attorneys’ fees and costs incurred in connection with this action in the total amount of \$47,500,000.00.

10. Defendants’ conduct was premeditated, wantonly reckless and/or malicious. They became knowing and willing participants in the Chicago Title RICO Enterprise and intentionally aided and abetted the subject fraudulent loan transaction and intentionally issued a title insurance policy insuring unmarketable title. Defendants’ acts were evil minded and display a wanton and willful disregard for the rights of Plaintiff. Defendants engaged in deliberate acts and/or omissions with knowledge of a high degree of probability of harm and reckless indifference to consequences.

11. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false that I am subject to punishment.

HUMPHREY LAW LLC
Local Counsel for Plaintiff

By: s/ Christopher C. Humphrey

Dated: January 25, 2011